



Carolina Power & Light Company

PO Box 1551
411 Fayetteville Street Mall
Raleigh NC 27602

Serial: PE&RAS-00-092

August 23, 2000

Ms. Annette Vietti-Cook
Secretary of the Commission
U.S. Nuclear Regulatory Commission
Washington, D.C. 20555-0001

ATTENTION: Rulemakings and Adjudications Staff

SUBJECT: Request for Comments on proposed Re-evaluation of Physical
Protection Regulations, 65 Fed. Reg. 36649 (June 9, 2000)

Dear Ms. Vietti-Cook:

These are Carolina Power & Light Company (CP&L) comments related to the Proposed Re-evaluation of Physical Protection Regulations, noticed in 65 Fed. Reg. 36649 on June 9, 2000.

CP&L encourages the NRC to consider those comments made by the Nuclear Energy Institute (NEI) on behalf of the nuclear power industry.

Specifically, CP&L notes that any further clarification of Radiological Sabotage, as defined in the current rule, needs to be limited to a linkage to significant core damage. Preventing significant core damage provides an appropriate margin below 10 CFR Part 100 limits to ensure public health and safety. CP&L also feels strongly that the proposed Critical Safety Function performance criterion is without basis. Existing target sets have been validated against Radiological Sabotage. Current performance criteria, which include protection of target sets, are designed to protect the public by preventing significant core damage.

Please refer any questions regarding this information to me at (919) 546-4579.

Sincerely,

A handwritten signature in black ink that reads "John R. Caves". The signature is written in a cursive, slightly slanted style.

John R. Caves, Manager
Nuclear Regulatory Affairs

Attachment

- c: L. A. Reyes, Regional Administrator - Region II
J. B. Brady, USNRC Senior Resident Inspector - SHNPP, Unit No. 1
USNRC Resident Inspector - HBRSEP, Unit No. 2
R. J. Laufer, NRR Project Manager - SHNPP, Unit No. 1
T. A. Easlick, USNRC Senior Resident Inspector - BSEP, Unit Nos. 1 and 2
Chair J. A. Sanford - North Carolina Utilities Commission
R. Subbaratnam, NRR Project Manager - HBRSEP, Unit No. 2
A. G. Hansen, NRR Project Manager - BSEP, Unit Nos. 1 and 2
J. W. Davis, Nuclear Energy Institute